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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

NIKTA JANATI,  
Plaintiff,  
  
vs.

UNIVERSITY OF NEVADA, LAS VEGAS  
SCHOOL OF DENTAL MEDICINE, R.  
MICHAEL SANDERS, STANLEY NELSON,  
CHRISTOPHER KYPUROS, KAREN WEST,  
BRANDON BIEHLER, ELENI COLLIS,  
AND DOES 1-20,

Defendants.

**CASE NO.: 2:15-CV-01367-APG-CWH**  
  
**STIPULATION AND ORDER TO  
EXTEND SCHEDULED DEADLINES**  
  
**[First Request]**

Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of record, hereby stipulate and request this Court extend the unexpired Discovery Deadlines in the above-captioned case for 120 days, up to and including, August 8, 2016. In support of this Stipulation, the parties state as follows:

**A. DISCOVERY COMPLETED TO DATE**

The parties have been actively engaged in the discovery process. The following discovery has been conducted:

1. Plaintiff's Request for Production (First Set) on Defendant University of Nevada, Las Vegas;
2. Plaintiff's Request for Production (First Set) on Defendant R. Michael Sanders;

3. Plaintiff's Request for Production (First Set) on Defendant Stanley Nelson;
4. Plaintiff's Request for Production (First Set) on Defendant Christopher Kypuros;
5. Plaintiff's Request for Production (First Set) on Defendant Karen West;
6. Plaintiff's Request for Production (First Set) on Defendant Brandon Biehler;
7. Plaintiff's Request for Production (First Set) on Defendant Eleni Collis;
8. Defendant University of Nevada, Las Request for Production (First Set) to Plaintiff, Nikta Janati;
9. Plaintiff's Request for Production (Second Set) on Defendant R. Michael Sanders;
10. Plaintiff's Request for Production (Second Set) on Defendant Stanley Nelson;
11. Plaintiff's Request for Production (Second Set) on Defendant Christopher Kypuros;
12. Plaintiff's Request for Production (Second Set) on Defendant Karen West;
13. Plaintiff's Request for Production (Second Set) on Defendant Brandon Biehler;
14. Plaintiff's Request for Production (Second Set) on Defendant Eleni Collis;
15. Depositions have been taken of the following Defendants:
  - a. Dr. R. Michael Sanders;
  - b. Dr. Stanley Nelson;
  - c. Christopher Kypuros, Ph.D.
  - d. Dr. Eleni Collis; and
  - e. Dr. Brandon Biehler
16. Depositions have been taken of the following percipient witnesses:
  - a. Dr. Lemon;
  - b. Dr. Dittmeyer;
  - c. Dr. Ancajas;
  - d. Dr. Davenport;
  - e. Dr. Mobley; and
  - f. Dr. Ingel

**B. DISCOVERY REMAINING TO BE COMPLETED**

The following discovery remains to be completed:

1           1.       Deposition of Defendant Dr. Karen West scheduled for March 23, 2016.

2           2.       Deposition of Plaintiff Nikta Janati for March 23, 2016.

3           3.       Additional written discovery is anticipated to be served by both Plaintiff and  
4 Defendants related to information obtained during the course of depositions

5           4.       Responses are still pending for both parties' outstanding requests for production.

6       **C.     REASON FOR REQUEST FOR EXTENSION OF DISCOVERY DEADLINES**

7           The parties have been conducting discovery in a diligent fashion. However, due to the  
8 number of defendants, the number of claims, and complexity of issues, the parties will be unable to  
9 complete discovery as set forth in the current Scheduling Order. A number of depositions have  
10 been held identifying additional people, documents, and issues that could be relevant to this case  
11 and need to be deposed and/or produced. Additionally, a number of these individuals identified no  
12 longer reside in Nevada and may necessitate coordination amongst the parties. This is the parties'  
13 first request for any such extension.

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**D. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY**

1. The Close of Discovery should be extended to August 8, 2016.
2. The Interim Status Report deadline should be extended to June 9, 2016.
3. The Dispositive Motion deadline should be extended to September 8, 2016.
4. All other deadlines in this Court's Scheduling Order dated October 14, 2015 remain the same.

DATED: MARCH 11, 2016.

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**ORDER**

Based on a review of the parties' stipulation for extension of time (doc. # 22), IT IS HEREBY ORDERED that the instant stipulation is **granted in part**. The parties shall have an additional **90 days** to complete discovery in this case.

  
United States Magistrate Judge